

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES

v.

KEMAL MRNDZIC

Docket No. 23-CR-10158

**DEFENDANT’S RENEWED MOTION FOR JUDGMENT OF ACQUITTAL OR,  
ALTERNATIVELY, MOTION FOR A NEW TRIAL**

Defendant, Kemal Mrndzic, hereby renews his motion, pursuant to Federal Rule of Criminal Procedure 29, for a judgment of acquittal on Counts I, II, III, VI, and VII of the Superseding Indictment. As grounds for this motion, Mr. Mrndzic submits that the government failed to prove every element of each of the offenses beyond a reasonable doubt at trial and that the evidence, taken in the light most favorable to the government, was insufficient to sustain a conviction on any of the charges. Alternatively, Mr. Mrndzic moves, pursuant to Federal Rule of Criminal Procedure 33, for a new trial in the interests of justice.

Further grounds for this motion will be set forth in the defendant’s memorandum in support, which will be filed by the Court’s previously established deadline of November 17, 2024.

Respectfully submitted,

/s/ Brendan Kelley  
Brendan Kelley

/s/ Forest O’Neill-Greenberg  
Forest O’Neill-Greenberg

/s/ Caitlin Jones  
Caitlin Jones

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**CERTIFICATE OF SERVICE**

I, Brendan Kelley, hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on October 30, 2024.

/s/ Brendan Kelley  
Brendan Kelley